

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) Case No. 18-CR-577 CRB
Plaintiff,) STIPULATION REGARDING HALO VIDEO
v.) CONFERENCING
MICHAEL RICHARD LYNCH and)
STEPHEN KEITH CHAMBERLAIN,)
Defendants.)

The United States and Defendants Michael Richard Lynch and Stephen Chamberlain hereby stipulate as follows:

1. Halo was HP's proprietary video-conferencing system that allowed users to meet in real-time through the data network, utilizing the video-conferencing technologies.

2. Halo conferencing was accessible from specific "Halo rooms." The Halo rooms were customized spaces, which allowed real-time meetings through technology. Each Halo room was outfitted with several cameras, which could pan the room and move to capture the speaker at any point in time, a video screen and monitors, speakers, and table microphones. In 2011, HP had Halo rooms in the following locations: six in Palo Alto, California; three in Cupertino, California; one in London, England; and two in Bracknell, England.

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1 3. Halo's technology enabled two or more groups of up to six people to hold a live meeting
 2 in two or more separate locations, and allowed meeting participants to make eye contact, share files and
 3 documents, and speak directly with one another. The organizer of a Halo session could activate either
 4 direct room-to-room communication or, where multiple rooms were involved, connection was made via
 5 a hosted virtual bridge.

6 4. HP developed the Halo Video Exchange Network (HVEN) to carry the video, audio, and
 7 data traffic between Halo units. The network was separate from a company's regular Internet Protocol
 8 (IP), but was based on the Transmission Control Protocol / Internet Protocol (TCP/IP) architecture and
 9 used standard networking equipment.

10 5. To initiate a Halo conference, the organizer used a desktop mouse to click on "Initiate
 11 Call," which activated the monitors of the video screen. The organizer then chose the unit location
 12 he/she wanted to engage with from a drop-down menu that appeared on the video screen, and made the
 13 call. Once the person on the other end answered the call, the connection was complete and the
 14 conference session proceeded. Where there were multiple groups in multiple Halo rooms, all groups
 15 dialed in to one central point – i.e., a hosted virtual bridge.

16 6. Whether point-to-point between two Halo rooms, or multiple rooms through a hosted
 17 virtual bridge, the audio and video traveled over an interstate wire from the organizer of the Halo session
 18 to the recipient(s).

19 7. In February 2011, "Halo 20C" was HP's Palo Alto Halo room Cannes 20C, located in
 20 Palo Alto, California; and "Halo London" was HP's London Halo room located in London, England.
 21 The audio and video feed for Halo conferences between Palo Alto Halo room Cannes 20C and HP's
 22 London Halo room traveled through an interstate wire to HP's on-site network, which then routed the
 23 audio and video, again via interstate wire, ultimately to HP's London Halo room. The point-to-point
 24 connection between Palo Alto and London was established through the HP network and via interstate
 25 wire.

26 8. In March 2011, "Halo Birmingham" was an HP halo room in Palo Alto, California; "Halo
 27 Cupertino 44" was an HP Halo room in Cupertino, California; and "Halo London" was HP's London
 28 Halo room located in London, England. The audio and video feed for Halo conferences between Palo

1 Alto Halo room Cannes 20C and HP's London Halo room traveled through an interstate wire to HP's
2 on-site network, which then routed the audio and video, again via interstate wire, ultimately to HP's
3 London Halo room. The point-to-point connection between Palo Alto and London was established
4 through the HP network and via interstate wire. The audio and video feed for Halo conferences among
5 these locations traveled through an interstate wire to HP's on-site network, which then routed the audio
6 and video, again via interstate wire, ultimately to HP's London Halo room. The point-to-point
7 connections among Palo Alto, Cupertino, and London were established through the HP network and via
8 interstate wire.

9 IT IS SO STIPULATED AND AGREED.

10 DATED: April 12, 2024

PATRICK D. ROBBINS
Attorney for the United States

11 */s/ Robert S. Leach*

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18 DATED: April 12, 2024

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